

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

TRUE THE VOTE, *et al.*

PLAINTIFFS

V.

CIVIL ACTION NO.: 3:14-CV-532-NFA

THE HONORABLE DELBERT HOSEMANN,  
in his official capacity, as Secretary of State for the  
State of Mississippi, *et al.*,

DEFENDANTS

STATE OF MISSISSIPPI

COUNTY OF LAUDERDALE

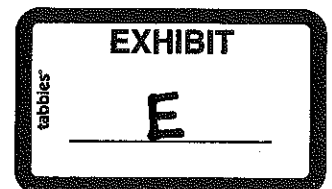
**AFFIDAVIT OF JEFF TATE**

COMES NOW the undersigned, Jeff Tate, being duly sworn, states on her oath as follows:

1. I am over the age of 21 years, have personal knowledge and am competent to testify regarding the matters contained herein.

2. I am a duly elected Election Commissioner for Lauderdale County, Mississippi. I am the current Chairman of the Lauderdale County Election Commission.

3. On or about July 8, 2014, Lauderdale County Circuit Clerk Donna Jill Johnson requested that I assist her in preparing a response to a written records request submitted by John and Karen Hobson. Attached hereto as Exhibit 1 is a true and correct copy of such records request. The request was dated July 7, 2014. I was not in the office on July 7, 2014 when the request was submitted.



4. I understood that the Hobsons had submitted a personal check in the amount of \$100.00 for payment in advance for completion of the records request. I understood that the Hobsons' check was being held until such time as the written records request was fulfilled.

5. In response to the records request, I utilized the Statewide Election Management System (SEMS) to generate four electronic files (Excel spreadsheets), which contained all of the information requested by Mr. and Mrs. Hobson in their records request.<sup>1</sup> On Thursday, July 17, 2014, I spoke by telephone with Mr. John Hobson to ascertain whether he wanted to receive the electronic files on a disk by U. S. mail to his address or whether he wanted the electronic files sent by email only to the email address listed on the records request. Mr. Hobson informed me that he did not want the disk, but rather the electronic files should only be emailed to the address which was included on the records request, that being taylor.phillips1@gmail.com.

6. On Thursday, July 17, 2014 with the assistance of counsel, I completed the response to the records request by having the four Excel spreadsheets emailed to taylor.phillips1@gmail.com in full and final response to the Hobsons' request for public records. Attached hereto as Exhibits "2", "3", "4", and "5" are the first pages from each of the Excel spreadsheets which were emailed to taylor.phillips1@gmail.com at the

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<sup>1</sup>In Lauderdale County, access to SEMS is controlled by the Lauderdale County Circuit Clerk. The Circuit Clerk has previously authorized me to have access to SEMS. As a result, I was able to assist the Circuit Clerk in responding to the Hobson's records request.

request of Mr. John Hobson. It takes approximately 4,697 pages to print the four Excel spreadsheets in landscape format.

7. Attached to the Hobsons' request is a page containing a typed description of specific documents requested, as follows:

Electronic file from the June 3<sup>rd</sup> Primary (By Precinct)

- List of all the Republican Voters who voted by Precinct:

- in person on Election Day
  - via absentee ballot

- List of all of the Democratic Voters who voted by Precinct:

- in person on Election Day
  - via absentee ballot

Electronic file from the June 24<sup>th</sup> Runoff (By Precinct)

- List of all the Republican Voters who voted by Precinct:

- in person on Election Day
  - via absentee ballot

- List of all of the Democratic Voters who voted by Precinct:

- in person on Election Day
  - via absentee ballot

The four Excel spreadsheets produced on July 17, 2014 included all of the information requested. In their written request, the Hobsons did not request copies of any other documents including poll books, absentee ballot applications, absentee voting envelopes, voter registration applications, federal post card applications, absentee ballots, or any

other type of voter registration materials.

8. As Exhibits "2", "3", "4" and "5" confirm, each spreadsheet includes each voter's name, address, distinct voter identification number, precinct, and party primary in which the person voted. Two of the four spreadsheets also include each voter's effective registration date. There are two spreadsheets for the June 3, 2014 primary election and two spreadsheets for the June 24, 2014 primary runoff election.

9. At no time during my telephone conversation with John Hobson did he ask for a copy of any poll book or pages from any poll book.


10. To this day, I have received no complaint or concern, whether written or oral, from the Hobsons or any other person claiming that the actual response to the Hobsons' request was inadequate.

11. To my knowledge, since July 7, 2014, no representative of the True The Vote has returned to either the office of the Lauderdale County Circuit Clerk or the office of the Lauderdale County Election Commission.

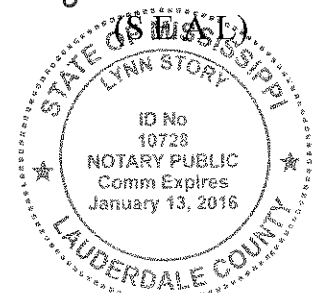
12. This concludes my Affidavit.

  
Jeff Tate

SWORN TO AND SUBSCRIBED BEFORE ME, this the 6<sup>th</sup> day of August, 2014.

  
NOTARY PUBLIC

My Commission Expires: 1-13-2016



## REQUEST FOR LAUDERDALE COUNTY VOTER ROLLS

/ INFO

DATE 7/7/14

YOUR PRINTED NAME

John Hobson

YOUR SIGNATURE

John Hobson

OFFICE REQUESTING

DISK

in excel, please email to taylor.phillips1@gmail.com  
format

MAILING ADDRESS

N/A

DAY TIME TELEPHONE #

281-796-8987

REQUEST MADE (MARK ONE) 0-999

\$25.00

✓

\*\*\*\* 1,000-10,999

\$50.00

\*\*\*\*

\*\*\*\* 11,000-20,999

\$75.00

\*\*\*\*

\*\*\*\* 21,000-

\$100.00

\*\*\*\*

MARK ONE:

ALPHABETIZE BY VOTERS NAME

ALPHABETIZE BY VOTERS NAME  
BY PRECINCT

ALPHABETIZE BY STREET NAME

ALPHABETIZE BY STREET NAME  
BY PRECINCTOTHER

MARK ONE:

PHYSICAL ADDRESS ONLY

MAILING ADDRESS ONLY

BOTH PHYSICAL AND  
MAILING ADDRESS✓\*\*\*\*\*  
DATE RECEIVED \_\_\_\_\_ DATE SENT OR PICKED UP \_\_\_\_\_

RECEIVED CHECK

RECEIVED CASH

BY CLERK OR

DEPUTY CLERK

MAKE CHECK PAYABLE TO LAUDERDALE COUNTY GENERAL FUND WITH THIS FORM  
 ATTACHED AND RETURN TO THE CIRCUIT CLERK OFFICE OR MAIL TO P O BOX 1005,  
 MERIDIAN MS 39302-1005. IF YOU HAVE ANY QUESTIONS CALL THE CIRCUIT CLERKS OFFICE  
 AT (601) 482-9731. REQUEST WILL BE COMPLIED WITHIN 7 DAYS.

EXHIBIT

tabbies

Electronic File from the June 3<sup>rd</sup> Primary (By Precinct)

-List of all the Republican Voters who voted by Precinct:

- in person on Election Day
- via absentee ballot

-List of all the Democratic Voters who voted by Precinct:

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Electronic File from the June 24<sup>th</sup> Runoff (By Precinct)

-List of all Republican Voters who voted by Precinct

- in person on Election Day
- via absentee ballot

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- in person on Election Day
- via absentee ballot

County : Lauderdale

## Unofficial Voting List

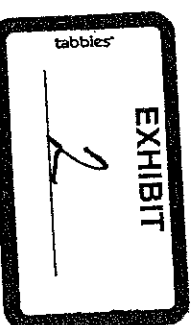
Date 07/10/2014

Report No : VR-028

Precincts : All Status : Active Registration Period Till : 7/10/2014 Election : 06/03/2014 - '14 Primary June 3, 2014 Period Till : 06/03/2014

Voter ID	Voter Name	Residential/Mailing Address	City	Precinct	Eff Regn Date	Party
537086	ABBNEY, WILLIAM S	2905 56 TH CT MERIDIAN MS 39305	MERIDIAN	313 - Thirteen	###	R
6/3/2014(R)	ABEL, ELISABETH NICOLE	1505 57 TH CT MERIDIAN MS 39305	MERIDIAN	101 - One	###	D
775325509						
6/3/2014(D)	ABEL, LINDA JO	1505 57 TH CT MERIDIAN MS 39305	MERIDIAN	101 - One	###	D
503275						
6/3/2014(D)	ABEL, MYRTLE IRENE	1815 APACHE RIDGE RD MERIDIAN MS 39305	MERIDIAN	101 - One	###	R
510200						
6/3/2014(R)	ABERNATHY, JERRY WAYNE	8531 HONEYSUCKLE DR COLLINSVILLE MS 39325	COLLINSVILLE	361 - Squalena	###	R
543356						
6/3/2014(R)	ABERNATHY, SARAH L	8531 HONEYSUCKLE DR COLLINSVILLE MS 39325	COLLINSVILLE	361 - Squalena	###	R
527156						
6/3/2014(R)	ABNEY, LAURA M	7740 LAKEVIEW DR MERIDIAN MS 39305	MERIDIAN	146 - New Lauderdale	###	R
502841						
6/3/2014(R)	ABNEY, RICHARD SAMUEL	7740 LAKEVIEW DR MERIDIAN MS 39305	MERIDIAN	146 - New Lauderdale	###	R
513593						
6/3/2014(R)						

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Unofficial Voting List

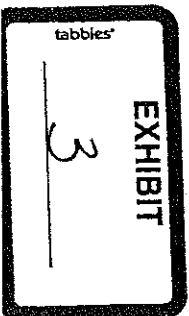
Date : 07/10/2014

Report No : VR-028

Precincts : All Status : Active Registration Period Till : 7/10/2014 Election : 06/24/2014 - Run Off Election for '6/3/2014 - '14 Primary June 3, 2014' Period Till : 06/24/2014

Voter ID	Voter Name	Residential/Mailing Ad City	Precinct	Eff Regn Date	Party
537086	ABBAY, WILLIAM S	2905 56 TH CT MERIDI MERIDIAN	313 - Thirteen	34656	R
545411	ABDELLA, SAMUEL EDI 1743 38 TH ST MERIDI, MERIDIAN		105 - Five	34671	R
510200	ABEL, MYRTLE IRENE	1815 APACHE RIDGE R MERIDIAN	101 - One	34680	R
39305					
6/24/2014(R)					
529033	ABERCROMBIE, CHRIS 5574 BLIND BROWN R BAILEY		329 - Center Hill	36283	R
6/24/2014(R)					
543356	ABERNATHY, JERRY W, 8531 HONEYSUCKLE D COLLINSVILLE		361 - Suqualena	36801	R
MS 39325					
6/24/2014(R)					
527156	ABERNATHY, SARAH L 8531 HONEYSUCKLE D COLLINSVILLE		361 - Suqualena	34678	R
MS 39325					
6/24/2014(R)					
502841	ABNEY, LAURA M	7740 LAKEVIEW DR MI MERIDIAN	146 - New Lauderdale	34673	R
6/24/2014(R)					
513593	ABNEY, RICHARD SAM 7740 LAKEVIEW DR MI MERIDIAN		146 - New Lauderdale	34657	R
6/24/2014(R)					
Statewide Election Management System					
County : Lauderdale Unofficial Voting List					
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Date : 07/10/2014					
Voter ID	Voter Name	Residential/Mailing Ad City	Precinct	Eff Regn Date	Party
532390	ABRAHAM, HELEN	5399 CREPE MYRTLE D MARION	238 - Marion	34680	R
39342					
6/24/2014(R)					
530475	ABRAHAM, WADIE HIL 5399 CREPE MYRTLE D MARION		238 - Marion	34655	R
39342					
6/24/2014(R)					

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Voter ID	Voter Name	Residential/Mailing Ad City	Precinct	Eff Regn Date	Party
519712	ASHMORE, LEON WAD	4060 1ST PL, MERIDIA MERIDIAN	105 - Five	34888	R
6/24/2014(R)					
513347	ASHMORE, MARY CATI	4060 1ST PL, MERIDIA MERIDIAN	105 - Five	34888	R
6/24/2014(R)					
544216	CHANDLER, ANDREW I	3311 1ST ST, MERIDIA MERIDIAN	410 - Ten	34678	D
6/24/2014(D)					
525880	GLOVER, KAYE N	4108 1ST PL, MERIDIA MERIDIAN	105 - Five	34686	R
6/24/2014(R)					
534270	GLOVER, THEODORE C	4108 1 ST PL MERIDIA MERIDIAN	105 - Five	34722	R
6/24/2014(R)					
540752	HEARN, BILLY R	3112 1ST ST, MERIDIA MERIDIAN	410 - Ten	38420	R
6/24/2014(R)					
544511	MCCLEON, BEVERLY JC	4122 1ST PL, MERIDIA MERIDIAN	105 - Five	34663	D
6/24/2014(D)					
539760	RUFFIN, JESSIE LEE	3108 1 ST ST MERIDIA MERIDIAN	410 - Ten	34880	D
6/24/2014(D)					

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Statewide Election Management System  
County : Lauderdale Unofficial Voting List

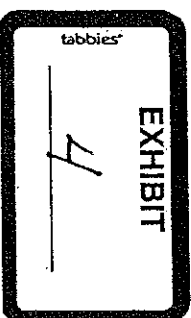
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Voter ID	Voter Name	Residential/Mailing Ad City	Precinct	Eff Regn Date	Party
513363	SIMS, DAVID D	5318 1ST ST, MERIDIA MERIDIAN	409 - Nine	37533	R
6/24/2014(R)					
507342	JONES, VIRGINIA D	5923 2ND ST, MERIDI MERIDIAN	409 - Nine	34673	D
6/24/2014(D)					
525139	LARKIN, ROSIE BEA	2320 2 ND AVE MERID MERIDIAN	206 - Six	34652	D
6/24/2014(D)					
541640	MURPHY, FREDDIE LEE	5917 2 ND ST MERIDIA MERIDIAN	409 - Nine	34670	D
6/24/2014(D)					
512020	MURPHY, SHUMEDA	5917 2ND ST, MERIDI MERIDIAN	409 - Nine	36910	D
6/24/2014(D)					

6/24/2014(D)



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519712	ASHMORE, LEON WADE	4060 1ST PL, MERIDIAN, MS 39301-1031	MERIDIAN	105 - Five	###	R
6/3/2014(R)	ASHMORE, MARY CATHERINE	4060 1ST PL, MERIDIAN, MS 39301-1031	MERIDIAN	105 - Five	###	R
513347						
6/3/2014(R)	CHANDLER, ANDREW LEE	3311 1ST ST, MERIDIAN, MS 39301-6246	MERIDIAN	410 - Ten	###	D
544216						
6/3/2014(D)	GLOVER, KAYE N	4108 1ST PL, MERIDIAN, MS 39301-1033	MERIDIAN	105 - Five	###	R
525880						
6/3/2014(R)	RUFFIN, JESSIE LEE	3108 1 ST ST MERIDIAN MS 39301	MERIDIAN	410 - Ten	###	D
539760						
6/3/2014(D)	SIMS, DAVID D	5318 1ST ST, MERIDIAN, MS 39307-6661	MERIDIAN	409 - Nine	###	R
513363						
6/3/2014(R)	JONES, VIRGINIA D	5923 2ND ST, MERIDIAN, MS 39307-6170	MERIDIAN	409 - Nine	###	D
507342						
6/3/2014(D)	LARKIN, ROSIE BEA	2320 2 ND AVE MERIDIAN MS 39301	MERIDIAN	206 - Six	###	D
525139						
6/3/2014(D)						

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